

Exhibit 5

April 5, 2022 Email

From: [Durivage, Lee C.](#)
To: [Samuel Datlof](#)
Cc: [Nina Menniti](#)
Subject: [External Email] Reyes v. Harris
Date: Tuesday, April 5, 2022 6:01:07 PM
Attachments: [image001.png](#)
[Ovalle - Harris Blacktopping s Responses to P s Rogs \(145069058 1\).pdf](#)
[Ovalle - D s Responses to P s RPD \(145086820 1\).pdf](#)
[Signed Verification Form \(145431906 1\).PDF](#)

Sam:

Attached please find the responses to plaintiffs' written discovery and the verification to the interrogatories – we will be supplementing our production of documents tomorrow once some additional items are bates numbered.

In terms of depositions, below is what would work for me/my clients:

- April 18 – Patrick Ulupano [this was the date you proposed];
- April 27 – Kelly Thomas;
- May 10 – Jim Harris [this was one of the dates you proposed];
- May 16 - Luis Miguel – [the was the date you proposed];
- May 23 - Adrian – [this was the date you proposed].

I will send you notices the plaintiffs above. We need to push up the dates for the other three plaintiffs – as you may recall, my wife is due on June 3 so I cannot push back all of these deps until the week she is due. I can likely get coverage for defense depositions if you want to take Harry or Jim that week, and push one of the guys to May 10 or the other dates below.

I am currently available on the following dates for depositions: May 5; May 11; and/or May 17, May 18 or May 19 for Harry and the three plaintiffs; and May 24 or 26 for Margaret Reyes. I did provide some of these later May dates for a case pending with Judge Wolson so let me know what works best so we can get on the calendar. I do plan on taking the depositions of the plaintiffs and Mrs. Reyes in person.

Lee

Lee C. Durivage

Attorney at Law
2000 Market Street, Suite 2300, Philadelphia, PA 19103
Direct: (215) 575-2584 | Main: (215) 575-2600 | Fax: (215) 575-0856
[bio](#) | [e-mail](#) | [website](#)



This e-mail transmission and any documents, files or previous e-mail messages attached to it, are confidential and are protected by the attorney-client privilege and/or work product doctrine. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of any of the information contained in, or attached to this e-mail transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify me by forwarding this e-mail to LCDurivage@MDWCG.com, or by telephone at (215) 575-2584 and then delete the message and its attachments from your computer.

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to

report this email as spam.